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Lake City Paint Thinner Response Trip Report

TDD: 97-07-0001

Contract: 68-W6-0008
May 1998

Region 10

START

Superfund Technical Assessment and Response Team

Submitted To: Anthony Barber, On-Scene Coordinator
U.S. Environmental Protection Agency
1200 Sixth Avenue
Seattle, WA 98101

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TRIP REPORT

DATE: April 16, 1999
TO: Anthony Barber, On-Scene Coordinator, EPA, Mail Stop ECL 116
FROM: Jeffrey Fowlow, E & E, Seattle, WA
SUBJ: Lake City Paint Thinner Response
REF: TDD 99-04-0005

Place Visited:

Wooded area on the 137th block of Northeast 41st Avenue in Seattle, Washington. The address of the nearest residence is 13710 Northeast 41st Avenue.

Purpose of Trip:

Investigate the report of abandoned paint-related wastes in a residential neighborhood in Seattle, Washington. Site-specific elements of work included: evaluate and record conditions at the site, including thorough photographic documentation; collect samples (if necessary); perform hazard categorization; provide minor containment; and provide for transportation and disposal of wastes.

Persons Responding:

Jeffrey Fowlow
Charles Gregory
Ecology and Environment, Inc.
Seattle, Washington

Persons Contacted:

None

Site Owners:

Unknown

Date of Trip:

Saturday, April 3, 1999

BACKGROUND

The United States Environmental Protection Agency (EPA) tasked the Ecology and Environment, Inc. (E&E) Superfund Technical Assessment and Response Team (START) to conduct a

removal assessment and minor containment of abandoned containers of potentially hazardous materials. On Saturday, April 3, 1999, EPA On-Scene Coordinator (OSC) Anthony Barber notified the START that an unknown person (or persons) had dumped approximately 30 to 35 containers of paint thinner into a ditch along Northeast 41st Avenue in Seattle, Washington. The OSC said that the Seattle Fire Department had initially responded to the scene and then made the report to the EPA.

START ACTIONS

April 3, 1999 Response

Two START responders arrived at the site at 2005 hours on Saturday, April 3, 1999. Initial reconnaissance of the site indicated that an estimated 35 to 45 containers of unknown waste had been deposited along the side of a secluded residential street in Seattle, Washington. Approximately 30 to 35 of the containers were 2.5-gallon capacity, white, plastic bottles. Approximately 5 to 10 of the containers were 5-gallon capacity, black, metal cans. It appeared from initial observations that most containers had an intact cap and that the contents of the containers was liquid. The dump site was in a wooded area along a secluded residential street. The dump site sloped steeply away from the road toward Lake Washington, located approximately 600 feet to the east. The residence nearest the dump site was approximately 200 feet south.

When the START appraised the OSC of the situation, the START was informed that previous abandonments of paint-related wastes had occurred in other parts of Seattle and Washington State. The OSC stated that the other abandonments included Rodda-brand products and that containers usually were covered with a strip or two of masking tape. The START confirmed that many of the 5-gallon capacity containers were labeled Rodda-brand lacquer thinner and most of the 2.5- and 5-gallon capacity containers had strips of masking tape around their circumference. The OSC tasked the START to thoroughly photographic document the dump site, assess the potential for release of waste material to the environment, retrieve and secure the containers, and arrange for proper disposal of the container contents.

Photographs of response activities are provided in Attachment A. The START collected all of the containers deposited and staged them along the street. All containers were examined for distinguishing marks or characteristics, which were documented in the site logbook. The containers were then sorted according to information obtained from the label. Table 1 summarizes the inventory of containers recovered from the site.

<p style="text-align: center;">TABLE 1</p> <p style="text-align: center;">LAKE CITY PAINT THINNER RESPONSE SEATTLE, WASHINGTON</p>			
QUANTITY OF CONTAINERS	CONTAINER CAPACITY	CONTAINER DESCRIPTION	LABEL INFORMATION
28	2.5	White, plastic, small-mouth opening.	"Klean-Strip 100% Mineral Spirits Paint Thinner. Thins paint, varnish. Multi-purpose degreaser. Product # PLA-9."
7	2.5	White, plastic, large-mouth opening.	"Recordsol Paint Thinner, Clean Air Solvent, Recochem, Inc., Montreal, Toronto, Edmonton, Vancouver."
6	5.0	Black, metal, bung-cap opening.	"Rodda #79 9461 5, Lacquer Thinner for Industrial Use. Rodda 461 Batch #23772082798A."
1	5.0	Black, metal, bung and pry-top opening.	"Wood Hide Exterior Solid Oil Stain, 4060 White, Parker Paint, Tacoma, Washington, 98E1045 HS."
2	5.0	Black, metal, bung-cap opening.	No label; otherwise identical to Rodda brand container.

The caps were missing from only 3 (two 2.5-gallon containers and one 5-gallon container) of the 44 containers recovered. Based on the amount of product remaining in the uncapped containers, it is estimated that a maximum of approximately 4 gallons of product could have been released to the environment. The START surveyed the soil in the dumpsite area with a photoionization detector and determined that organic vapor detections, averaging 15 to 20 parts per million (ppm) above background, could be found in small, isolated locations. The maximum concentration encountered was 30 ppm. Given the slope of the dumpsite and the limited amount of material spilled, it did not appear feasible to attempt to remove the potentially contaminated soil.

All containers were transported to the START warehouse and secured pending disposal.

April 9, 1999 Flash Point Analysis

On April 7, 1999, the START accompanied an agent from the EPA's Criminal Investigation Division (CID) to the START warehouse to examine the stored containers. After examination of the containers, the CID agent culled six containers for flash point analysis. The containers selected represented one each (plus an additional 2.5-gallon container) of the waste types available as identified by information from their labels.

On April 9, 1999, START chemists performed Pensky-Martens Closed Cup flash point analysis on samples from the six selected containers. A memorandum detailing the testing procedures is provided in Attachment B. Every sample reached its flash point at a temperature consistent with a Resource Conservation and Recovery Act (RCRA) designation of flammable, meaning a flash point temperature of less than 140 degrees Fahrenheit. The descriptions of the samples collected were consistent with waste paint thinners and paints.

April 27, 1999 Disposal

As directed by the EPA, all containers and container contents were disposed of in the Small Quantity Generator Waste Acceptance Program at Philip Environmental in Seattle, Washington. The Check-In Receipt and Certification Statement from Philip Environmental is provided in Attachment C.

CONCLUSION

On April 3, 1999, the START responded to the scene of 44 abandoned containers of paint-related wastes. The START recovered, inventoried, and removed the containers until arrangement for disposal could be made. The START estimates that approximately four gallons of product may have been released to the environment and that the released material is not recoverable. START chemists performed Pensky-Martens Closed Cup flash point analysis on samples from six of the containers and determined that all of the samples exhibited flammable characteristics as defined by RCRA. On April 27, 1999, all containers were disposed of at the Philip Environmental facility in Seattle, Washington.

No further effort is anticipated under this TDD.

ATTACHMENT A
PHOTOGRAPHIC DOCUMENTATION

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PHOTOGRAPH IDENTIFICATION SHEET

Camera Serial #: Disposable
Lens Type: N/A

TDD #: 99-04-0005

Site Name: Lake City Paint Thinner Response

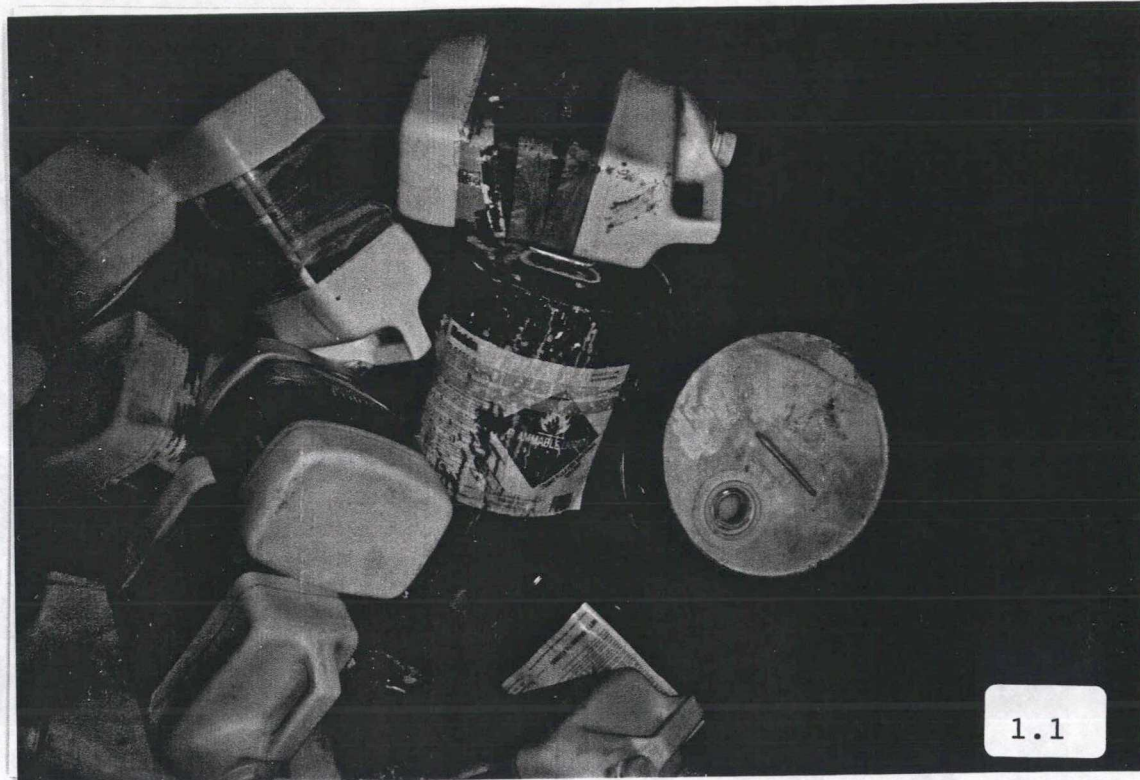
Photo No.	Dir.	By	Date	Time	Description
1.1	North	CG	4-3-99	2009	Containers strewn around dump site.
1.2	Down	CG	4-3-99	2009	Close-up of abandoned containers.
1.3	North	JF	4.3.99	2015	Close-up of 2.5-gallon container of Klean-Strip brand paint thinner.
1.4	North	JF	4-3-99	2030	All containers staged on roadside. Containers have been segregated by markings on the containers. The white 2.5-gallon containers are shown in the foreground. The black 5.0-gallon containers are shown in the background.
1.5	North	JF	4-3-99	2040	Close-up of container labeled "Wood Hide Exterior Solid Oil Stain".
1.6	North	JF	4-3-99	2050	Close-up of container labeled "Rodda Lacquer Thinner".
1.7	North	JF	4-3-99	2100	Close-up of container labeled "Recordsol Paint Thinner".
1.8	North	JF	4-3-99	2105	Close-up of container labeled "Wood Hide Exterior Solid Oil Stain".
1.9	North	JF	4-3-99	2120	Close-up of container labeled "Rodda Lacquer Thinner".

Key:

CG = Charlie Gregory

JF = Jeffrey Fowlow

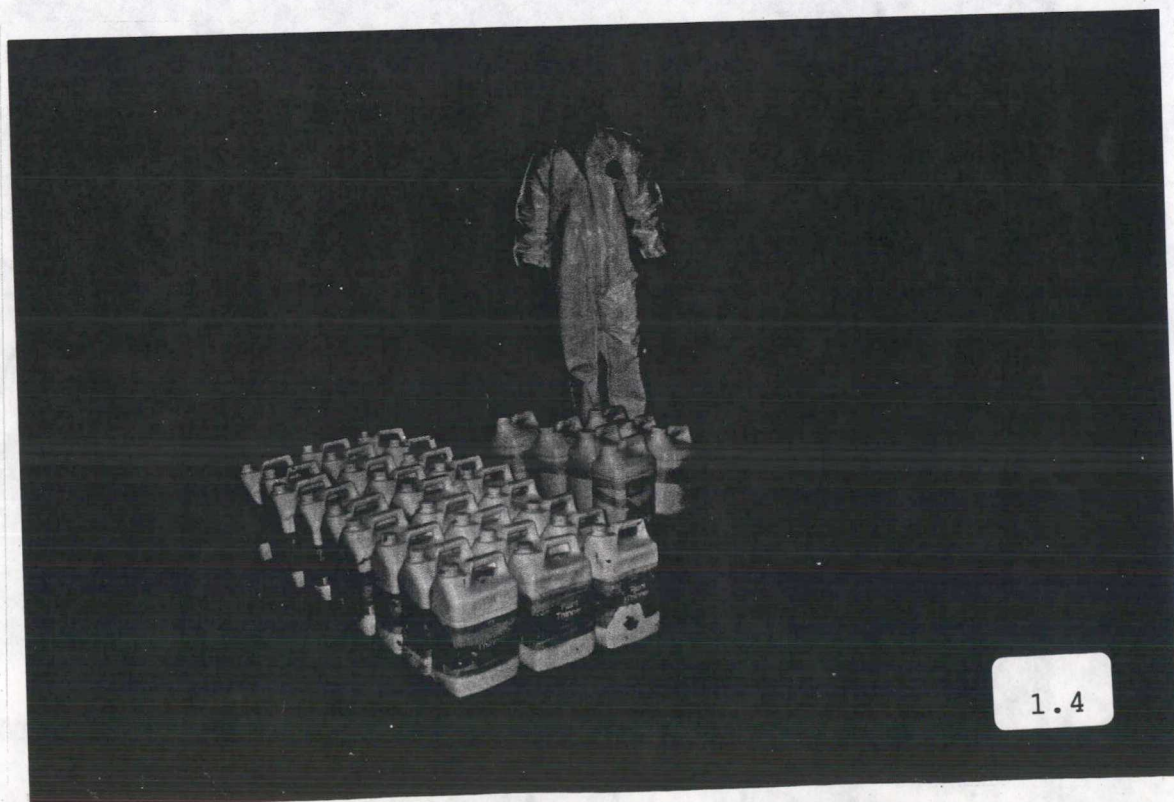
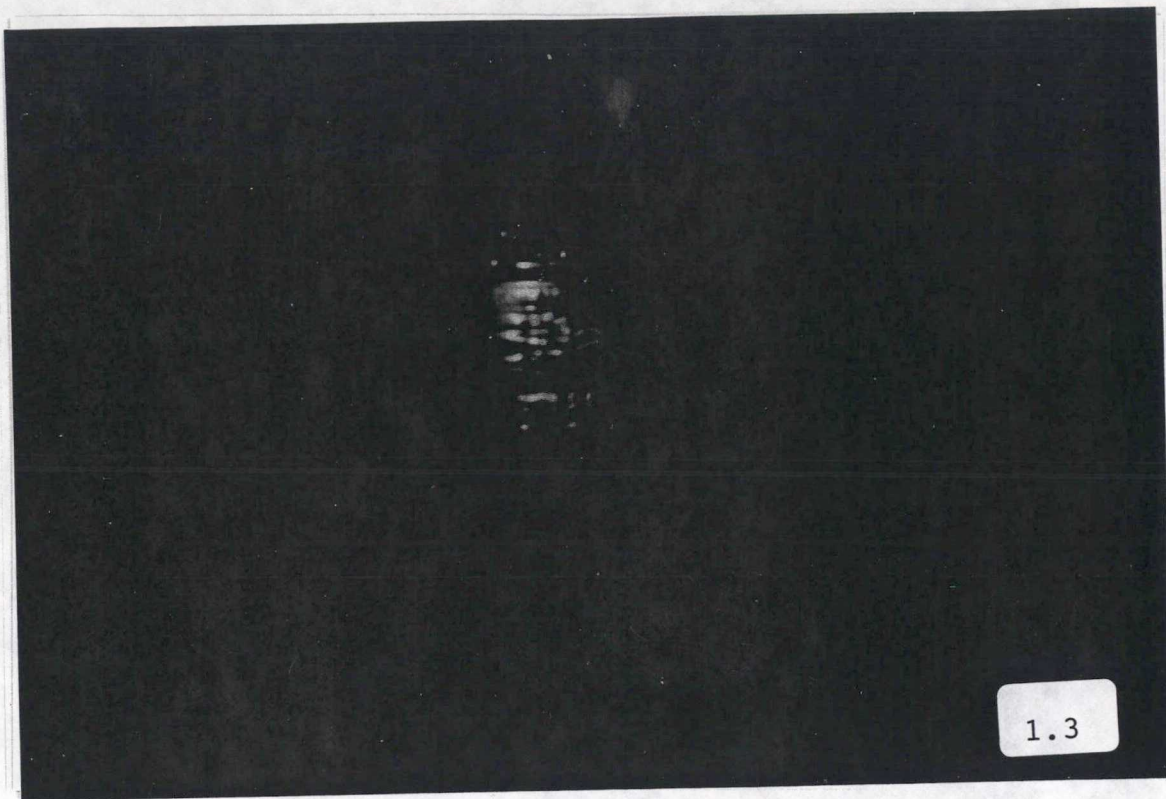
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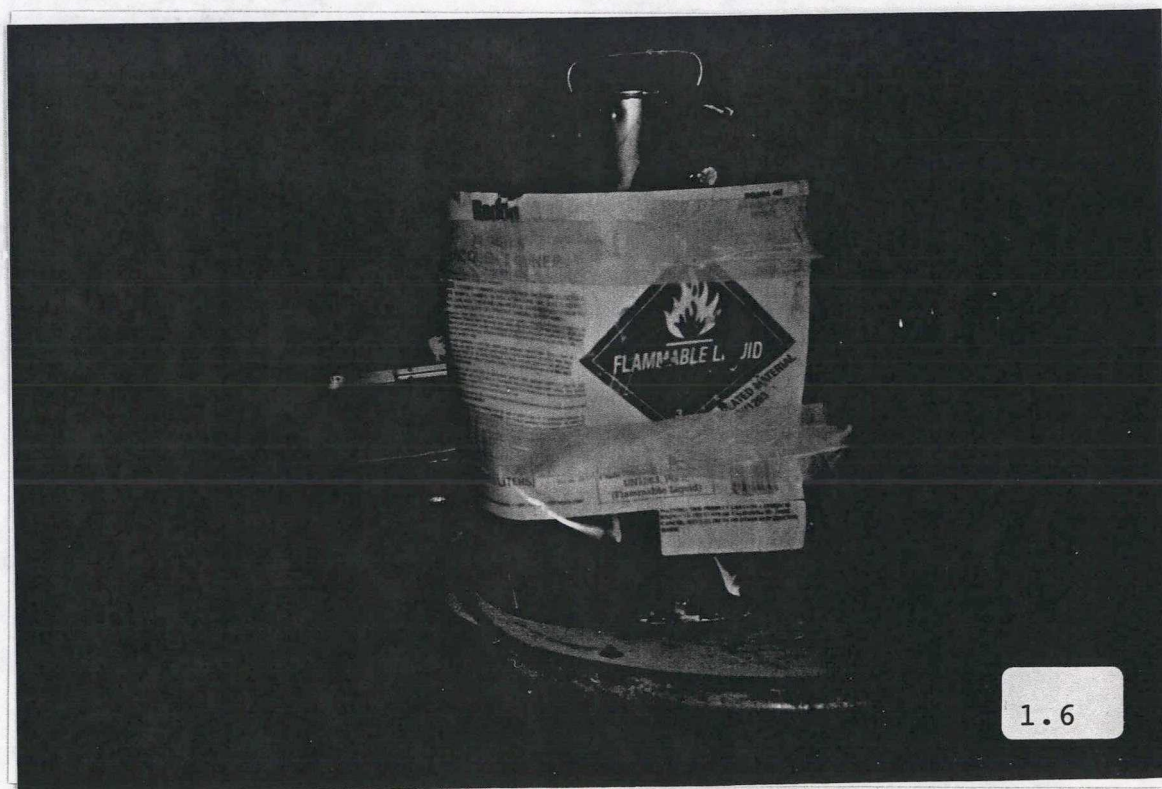
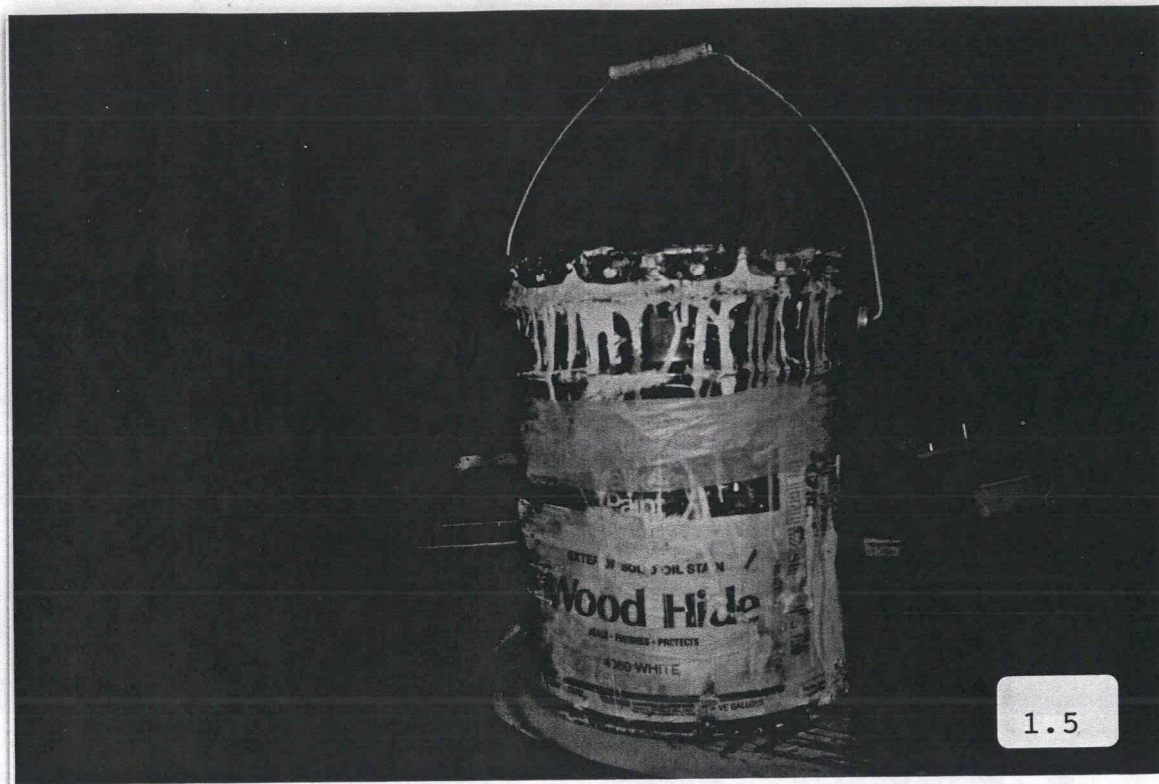


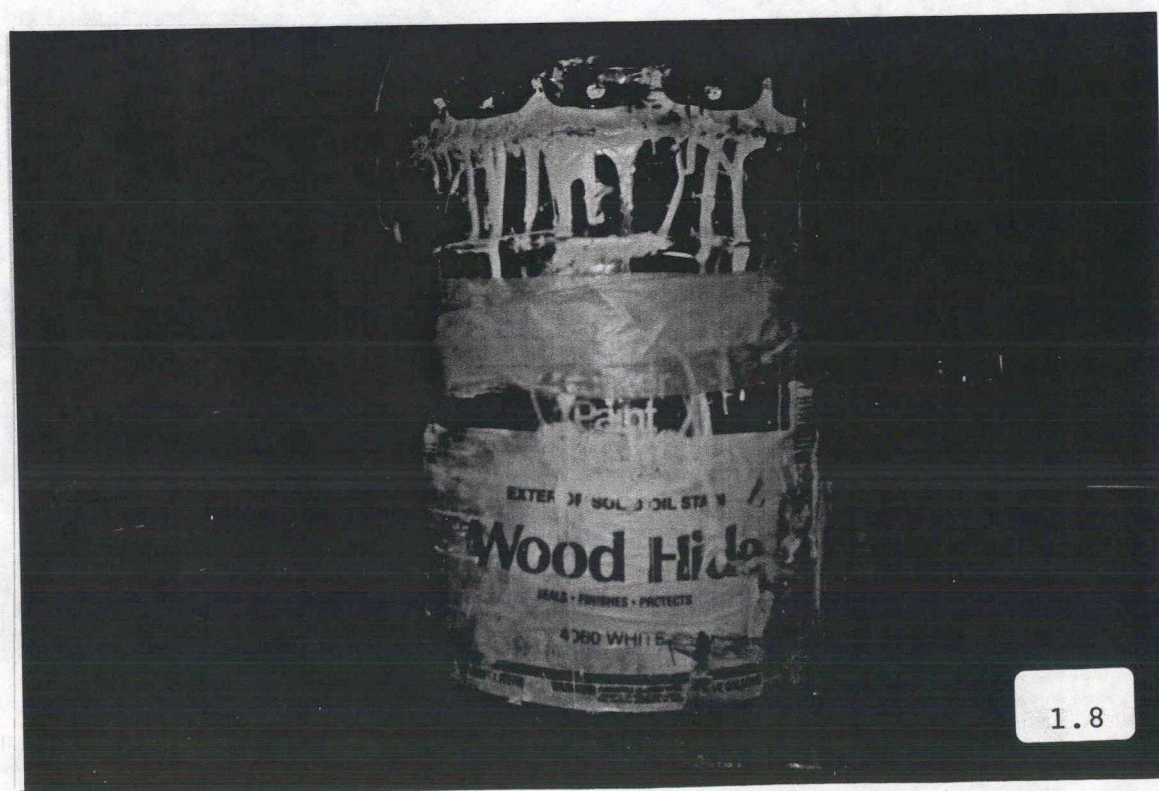
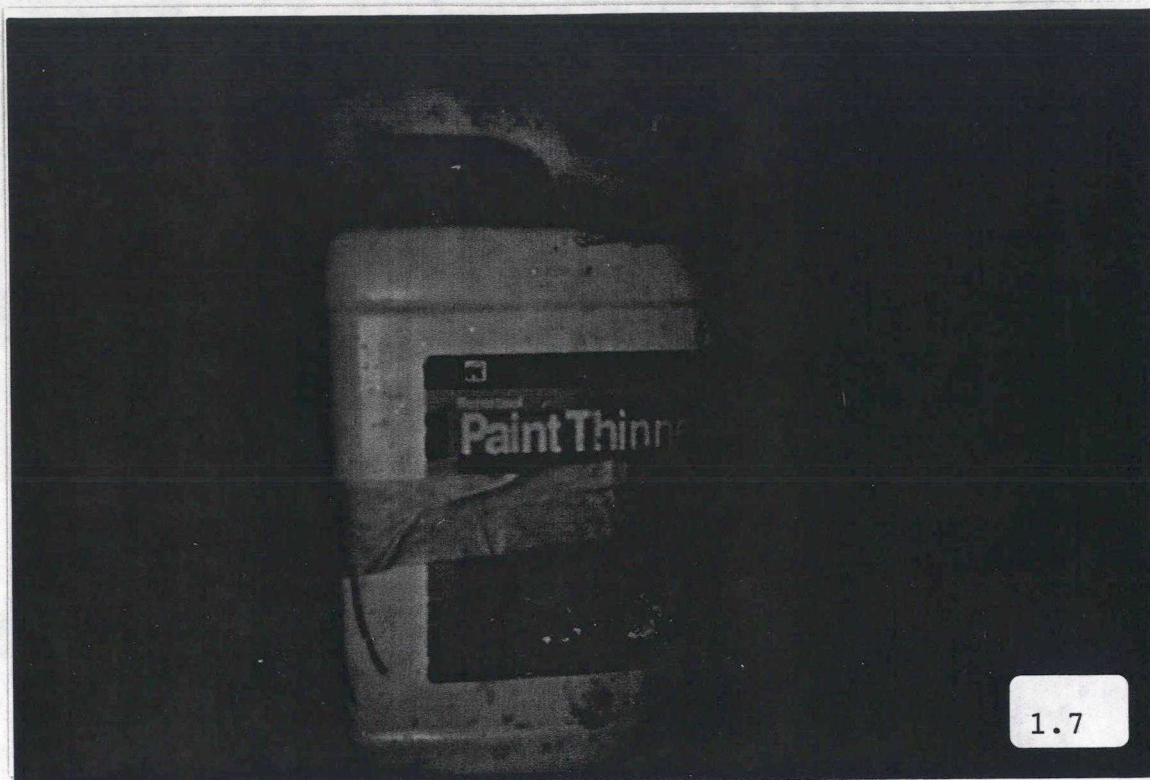
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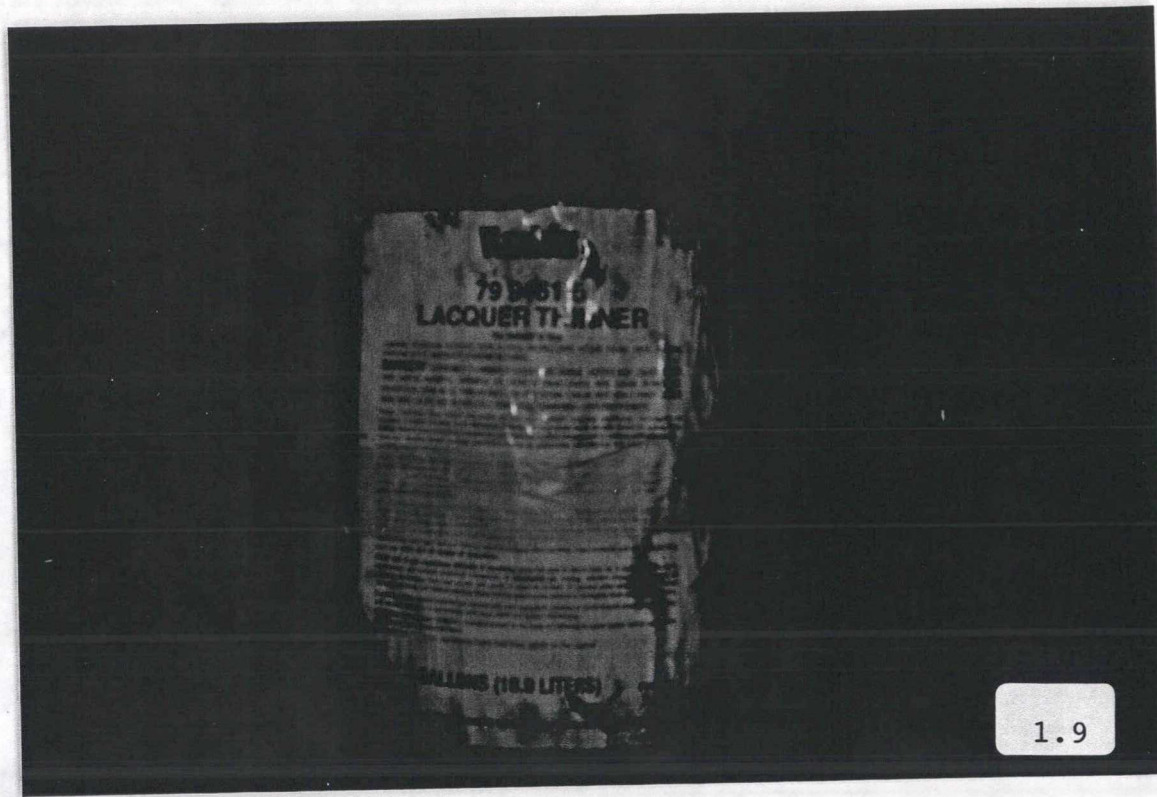


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ATTACHMENT B
PENSKY-MARTENS FLASH POINT ANALYSIS MEMORANDUM

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ecology and environment, inc.

International Specialists in the Environment

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Seattle, Washington 98104

Tel: (206) 624-9537, Fax: (206) 621-9832

MEMORANDUM

Date: April 12, 1999

To: Jeff Fowlow, Project Manager, Ecology and Environment, Inc.

From: David Byers, Chemist, CHMM, Ecology and Environment, Inc. DB

Subj: Pensky-Martens Flash Point Analysis

On April 9, 1999 I performed Pensky-Martens Closed Cup flash point analysis on 6 liquid samples following ASTM method D-93 (96), Procedure A, *manual apparatus*. Descriptions of the samples, the containers, and the flash point are given below. The sample containers were marked with the 8-digit sample number and my initials (DB) using either a red felt-tipped permanent marker, or a yellow paint stick. The samples were also tested for the presence/absence of water using Watesmo[®] paper (a product of Gallard-Schlesinger Industries, Inc.). All samples tested negative for water.

Sample Number	Container Size (gal.)	Estimated Percent Full	Container Description	Sample Description	Flash** Point °F
99046001	2.5	75%	White plastic container with red cap. No label or markings.	Tan/brown murky liquid. Thin solvent-like viscosity.	<68
99046002	2.5	75%	White Plastic container. Label reads: Klean-strip, 100% Mineral Spirits Paint Thinner.	Tan/brown murky liquid (less cloudy than 99046001). Thin/solvent-like viscosity.	111
99046003	5	100%	Black metal container. No markings or label. Screw cap.	Whitish murky liquid. Viscosity slightly thicker than water.	<65
99046004	5	100%	Black metal container (tab-top whole removable lid). Label reads: Wood Hide, Exterior Solid Oil Stain, Parker Paints, White.	Tan/creamy liquid. Oily viscosity (less viscous than motor oil).	<66
99046005	5	100%	Black metal screw-cap container. Label reads: Rodda 79 9461 5, Lacquer Thinner, Batch # 25359, Date 01/12/99 A.	White creamy liquid. Viscosity similar to water.	<78
99046006	2.5	66%	White plastic container. Label reads: Record Sol, Paint Thinner.	Dark blue liquid. Viscosity slightly thicker than water.	109
**A "<" symbol prior to the flash point indicates that the sample flashed violently at the ambient temperature. The actual flash point is much lower than the ambient temperature listed. The Flash Point temperatures have been corrected for barometric pressure per ASTM D-93 section 13.					

ATTACHMENT C
CHECK-IN RECEIPT AND CERTIFICATION STATEMENT

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Corporate Sales: 1100 Oakesdale Ave. SW
Renton, WA 98055 • (206) 227-0311

For Pre-registration & Billing Questions call:
CORPORATE OFFICE: 1100 Oakesdale Ave. S.W.
 Renton, WA 98055 • (206) 204-7049 or 1-800-327-7759

- ☐ Kent Facility: 20245 77th Ave. S.
Kent, WA 98032 (206) 872-8030
- ☐ Tacoma Facility: 1701 Alexander
Tacoma, WA 98421 (206) 627-7568
- ☒ Georgetown Facility: 734 S. Lucile St.
Seattle, WA 98108 (206) 762-3362
- ☐ Other:

Pg. _____ of _____ **SMALL QUANTITY GENERATOR WASTE ACCEPTANCE PROGRAM
CHECK-IN RECEIPT AND CERTIFICATION STATEMENT**

I certify that the following information is correct, and I have read and understand the requirements for participation in the PHILIP ENVIRONMENTAL or _____ Small Quantity Generator Waste Acceptance Program. I further certify that I am a small quantity generator as defined by Washington State regulations, and this quantity of waste does not exceed the specified limits for the type of waste being disposed. If this waste is later found to exceed small quantity limits or contain materials not accepted under this program, I agree to complete a hazardous waste manifest and comply with other state regulations as appropriate.

COMPANY NAME: 11111111111111111111 COMPANY REP: (PLEASE PRINT) John
 COMPANY ADDRESS: (NO P.O. BOX) 11111111111111111111 SIGNATURE: [Signature]
 CITY, STATE, ZIP 11111 1111 11111 TITLE: 11111111111111111111 DATE: 11/11/11
 COMPANY PHONE: (000) 111-1111-1111 EPA ID# (IF APPLICABLE) 11111111111111111111

[illegible]

Credit to
C.C. # _____ Generator # _____ P.O. # _____

METHOD OF PAYMENT: CASH ☐ CHECK ☐ CHECK NO. _____ TOTAL PAID \$ _____ CASH CHANGE \$ _____

Philip Environmental certifies that the materials accepted below as conditionally exempt Small Quantity Generator Waste will be managed in compliance with all applicable Federal, State, and local rules, regulations and mandates.

Facility Owner/Operator: Certification of receipt of Conditionally Exempt Small Quantity Waste covered by this check-in receipt.

Printed/Typed Name: _____ Signature: _____ Date: _____

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